

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

IN RE: AQUEOUS FILM-FORMING
FOAMS PRODUCTS LIABILITY
LITIGATION

MDL No.
2:18-mn-2873-RMG

This Document Relates to:

***City and County of Denver v. 3M Company,
et al., Case No. 2:23-cv-01250-RMG***

**CITY AND COUNTY OF DENVER’S MOTION FOR
LEAVE TO FILE AMENDED COMPLAINT**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law in Support of City and County of Denver’s (“Denver”) Motion for Leave to File Amended Complaint and the exhibits attached thereto, Denver moves pursuant to Rules 15(a)(2) and 21 of the Federal Rules of Civil Procedure for leave to amend its Amended Complaint.

PLEASE TAKE FURTHER NOTICE, that pursuant to Local Rule 7.06, opposing affidavits and memoranda of law, if any, must be filed within fourteen days of the filing of this motion, unless the parties agree otherwise or the Court imposes a different schedule.

Pursuant to CMO 2A and Local Rule 7.02, Plaintiff has conferred with the PEC and DCC. The PEC consents to this filing. Defense counsel have not provided their position prior to filing.

Dated: May 31, 2023

Respectfully submitted,

CITY AND COUNTY OF DENVER

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By: /s/ Andrew W. Croner

By /s/ Edward Gorman

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CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2023, I electronically filed the foregoing document with the Clerk of the Court using the Court's CM/ECF system, which shall send notice to all counsel of record.

Dated: May 31, 2023

By: /s/ Andrew W. Croner
Andrew Croner